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July 14, 2025

VIA ECF

Honorable Robert W. Lehrburger, U.S.M.J.
United States District Court
Southern District of New York
500 Pearl Street, Room 1960
New York, NY 10007

Granted.

SO ORDERED:

7/14/2025



HON. ROBERT W. LEHRBURGER
UNITED STATES MAGISTRATE JUDGE

Re: *M. Paz, et al., v. Elio&Sons1 LLC, et al.,*
Case No. 1:25-cv-03381-JAV-RWL

Dear Judge Lehrburger:

This firm represents respondents the Morgan Group, LLC (the "Morgan Group"), Scott Morgan and Ryan Morgan (collectively, the "Morgan Group Defendants") in the above-referenced proceeding. Pursuant to Sections I.A and I.D of Your Honor's Individual Practices in Civil Cases, we write to respectfully request an adjournment of the Initial Pretrial Conference currently set for Monday, July 21, 2025 at 11:30 am before Your Honor, for another date and time at the Court's earliest convenience on any day during the week beginning Monday, August 25, 2025.

There have been no prior requests by any party for an adjournment of this conference, which was scheduled last month via Notice of Hearing. *See* Dkt. 18. We have conferred with counsel for Plaintiff, who consents to this application. The only other scheduled dates in this matter would be affected by the requested extension would be the Parties' deadline to complete and jointly file a proposed Civil Case Management Plan and Scheduling Order, which will be due one week prior to the hearing, if rescheduled.

At this time, there has been no appearance from defendants Elio&Sons1 LLC, Premtim Gjonbalic or Donika Islami. The Parties who have appeared hope to confirm an appearance for these defendants, or request a certificate of default, prior to the rescheduled conference, so that it can be determined if they will participate in these proceedings.

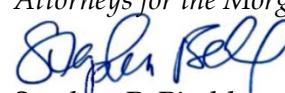
We thank the Court for its consideration of this request.

Respectfully Submitted,

CLIFTON BUDD & DEMARIA, LLP
Attorneys for the Morgan Group Defendants

By:

Stephen P. Pischl



CLIFTON BUDD & DEMARIA, LLP

Hon. Robert W. Lehrburger, U.S.M.J.

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cc: **VIA ECF**

LAW OFFICE OF PETER A. ROMERO, PLLC

David D. Barnhorn, Counsel

Attorneys for the Plaintiff